



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

March 30, 2020

BY ECF and EMAIL

The Honorable Katherine Polk Failla
Thurgood Marshall
United States Courthouse
40 Foley Street
New York, New York 10007

Re: *United States v. Clifford Taylor, 19 Cr. 410 (KPF)*

Dear Judge Failla:

The Government respectfully submits this letter further to the conference convened earlier today. In the event the Court grants the defendant's motion for bail pursuant to Title 18, United States Code, Section 3142(i) (ECF No. 30), the Government requests, with the consent of defense counsel, that the Court impose the following conditions of release:

1. Personal recognizance bond in the amount of \$100,000, to be signed by the defendant and co-signed by Ms. Gwendolyn Thompson and the defendant's two adult children.¹
2. All mandatory conditions of release included in the Court's standard "Order Setting Conditions of Release" form.
3. Pretrial Services supervision as directed by the Pretrial Services Office.
4. Surrender of all passports and other travel documents and no applications for new or replacement travel documents.
5. Drug testing as directed by the Pretrial Services Office.
6. The defendant shall not possess a firearm, destructive device, or other weapon.
7. Home incarceration at Ms. Thompson's residence in New York, New York, with electronic monitoring by means chosen at the discretion of the Pretrial Services

¹ Defense counsel is in the process of securing commitments from Ms. Thompson and the defendant's two adult children to serve as sureties. Defense counsel reserves the right to seek modification of this proposed condition should he encounter difficulty securing the defendant's two adult children to serve as sureties.

Office. The defendant shall be confined to the residence of Ms. Thompson 24-hours per day except for emergency medical visits. Any other release from the residence must be approved by either the Pretrial Services Office or by the Court on application from defense counsel.

8. No visitors to the residence of Ms. Thompson except for family members of Ms. Thompson or the defendant.
9. The defendant shall not use or possess any narcotic drug or controlled substance unless prescribed by a licensed medical practitioner.
10. The defendant shall be released upon the signature of the three sureties on the bond, the completion of a virtual home visit of Ms. Thompson's residence, and the approval by the Pretrial Services Office of Ms. Thompson's residence as a place for home incarceration. The defendant himself must sign the bond electronically within 24 hours of being released from custody.
11. The defendant shall obtain a smartphone with video-calling capabilities within 14 days of release and, upon obtaining that smartphone, furnish contact information for that smartphone forthwith to the Pretrial Services Office.
12. Defense counsel shall submit a status update letter to the Court once a week after consultation with the Government, informing the Court as to the defendant's status, health, and compliance with the conditions of release.

Respectfully submitted,

GEOFFREY S. BERMAN
United States Attorney

by: /s/
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cc: Florian Miedel (by ECF and email)